



*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 20, 2022

**VIA ECF**

The Honorable Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Sung Kook (Bill) Hwang, et al.*, 22 Cr. 240 (AKH)**

Dear Judge Hellerstein:

On June 1, 2022, the parties in the above-captioned case appeared before the Court for an initial appearance. Prior to that conference, the Government had produced significant discovery to the defendants, and the Court set a deadline for the production of remaining discovery of July 20, 2022, and set a subsequent conference for August 9, 2022, at 11:00 a.m.

Since the initial June 1 conference, the Government has continued to produce discovery, including significant additional materials. To date, the Government has produced to the defendants a substantial volume of discovery, totaling more than 7,000,000 pages of materials. Due to the quantity of data being processed for production, however, the Government is not able to complete the production of all material currently in its possession by today, July 20, 2022. Accordingly, the Government respectfully requests an extension of the discovery deadline to August 18, 2022. The Government correspondingly requests an adjournment of the next conference to Thursday, September 8, 2022, at 12:00, which the Government understands is available in the Court's schedule. Such an adjournment will preserve an equivalent amount of time available to the defendants between the completion of discovery production and the conference, to consider what motions, if any, they intend to file. The Government has conferred with counsel to both defendants, Bill Hwang and Patrick Halligan, respectively, and counsel for each defendant consent to these requests.

The Government also notes that consistent with its colloquy with the Court at the initial conference, and although it does not believe additional particulars are required by the Rules of Criminal Procedure, it intends to provide additional information to the defendants to assist in their review of discovery and preparation for trial, including details regarding misrepresentations identified to date by the Government. The Government intends to provide such information to the defendants by the proposed discovery deadline of August 18, 2022, well in advance of the proposed rescheduled conference date.

Finally, the Government respectfully requests that the Court exclude time under the Speedy Trial Act through the date of the rescheduled conference, to allow for the continued production

and review of discovery, in the interests of justice. Counsel to each defendant consents to this request.

Respectfully submitted,

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Cc: *Counsel to all defendants* (via ECF)